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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FIGUEIREDO FERRAZ CONSULTORIA E  
ENGENHARIA DE PROJETO LTDA.,

No. 08-CV-0492 (WHP)

Plaintiff,

-against-

**NOTICE OF MOTION**

THE REPUBLIC OF PERU, MINISTERIO DE  
VIVIENDA, CONSTRUCCION Y SANEAMIENTO, and  
PROGRAMA AGUA PARA TODOS (PAPT) (successor  
by integration to PROGRAMA DE APOYO A LA  
REFORMA DEL SECTOR SANEAMIENTO (PARSSA),  
formerly known as PROYECTO ESPECIAL  
PROGRAMA NACIONAL DE AGUA POTABLE Y  
ALACANTARILLADO (PRONAP)),

Defendants.

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law,  
Declaration of Dr. Katty Aquize, Declaration of Juan Basombrio, Esq., Notice of Intention to  
Rely Upon Foreign Law, and upon any further filings by and/or arguments of defense counsel at  
the hearing and all prior pleadings herein, Defendants Republic of Peru, Ministerio de Vivienda,  
Construccion y Saneamiento and Programa Agua Para Todos (collectively, "Defendants")  
hereby move for an Order directing Plaintiff Figueiredo Ferraz Consultoria E Engenharia De  
Projeto Ltda. to pay the amount of \$1,151,312.10 to Defendants, in order to reimburse

Defendants for their reasonable attorneys' fees and costs incurred herein, as well as for such other relief as the Court may deem to be just and proper.

Dated: New York, New York  
February 17, 2012

Respectfully submitted,

DORSEY & WHITNEY LLP

By: s/ Juan C. Basombrio  
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